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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DAMIEN PITTMAN,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 20 CV 987
)	
STEPHEN LOWERY,)	
TARGET CORPORATION d/b/a SUPER)	
TARGET and HOGAN TRANSPORTS,)	
INC.,)	
)	
Defendants.)	

**DEFENDANTS' NOTICE OF REMOVAL OF CAUSE TO THE UNITED STATES
DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS**

NOW COME the Defendants, HOGAN TRANSPORTS, INC., TARGET CORPORATION d/b/a SUPER TARGET and STEPHEN LOWERY, by and through their attorney, Kingshuk K. Roy of PURCELL & WARDROPE, CHTD., and pursuant to 28 U.S.C.A. 1332, 1441 and 1446, hereby provide notice of their removal of this cause pursuant to said statutes and for the following reasons:

1. This action was commenced against Hogan Transports, Inc., Target Corporation and Damien Pittman, the only defendants, in the Circuit Court of Cook County, bearing case number 2020 L 105, on January 3, 2020, arising out of an alleged vehicular collision occurring in the County of Cook, City of Lansing, State of Illinois. A copy of the complaint was served on January 16, 2020. This notice is filed within 30 days after service of the complaint on the defendant.

2. At the time the action was commenced, the plaintiff was a citizen of the County of Cook, City of Markham, State of Illinois.

3. The defendant Hogan Transport, Inc. was and is a corporation organized and existing under the laws of the State of Missouri with its principal place of business in St. Louis, Missouri.

4. The defendant Target Corporation was and is a corporation organized and existing under the laws of the State of Minnesota with its principal place of business in Minneapolis, Minnesota.

5. The defendant Stephen Lowery was and is a citizen of the City of Centreville, State of Michigan.

6. The amount in controversy exceeds \$75,000, exclusive of interest and costs, as appears from the plaintiff's complaint, a copy of which is attached to and incorporated by reference in this notice.

7. There is complete diversity of citizenship between the plaintiff and all defendants and the United States district courts have original jurisdiction over this civil action under 28 U.S.C. §1332.

8. The defendant attaches to this notice copies of all process, pleadings, and orders that have been served on it pursuant to 28 U.S.C. §1446(a).

- Complaint at Law;
- Summons directed to Target Corporation;
- Service of Process 1/15/20;
- Service of Process 1/16/20;
- Defendants' Appearance & Jury Demand; and
- Defendants' State Court Notice of Removal

(Group Exhibit A)

9. Venue is proper before the U.S. District Court for the Northern District of Illinois pursuant to 28 U.S.C. §1441(a) and 1446(a) because the U.S. District Court for the Northern District of Illinois is the federal district embracing the Circuit Court of Cook County, Illinois, where the state court action was originally filed.

WHEREFORE, the Defendants, HOGAN TRANSPORTS, INC., TARGET CORPORATION d/b/a SUPER TARGET and STEPHEN LOWERY pray that this cause be removed to the United States District Court for the Northern District of Illinois.

Respectfully submitted,

PURCELL & WARDROPE, CHTD.

By: /s/ Kingshuk K. Roy
Kingshuk K. Roy

PURCELL & WARDROPE CHTD
10 S. LaSalle St., Suite 1200
Chicago, IL 60603
Tel: (312) 427-3900
KKR@pw-law.com